

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : Case No. 2:23-CR-00293 (JMA)(JMW)  
:  
v. : **MOTION TO SEAL**  
:  
ADAM KAPLAN and :  
DANIEL KAPLAN, :  
:  
Defendants. :  
:  
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**PLEASE TAKE NOTICE** that upon the accompanying Declaration of S. Gale Dick dated May 16, 2025 and Exhibits 1 through 21, Defendant Adam Kaplan will move this Court, before the Honorable Joan M. Azrack, at a date and time convenient for the Court, to seal Exhibits 1-15 and 17, 18, 20, and 21. Adam Kaplan moves to seal Exhibits 1-11, 15, 17, 18, and 21 pursuant to the Protective Order, so ordered on April 15, 2025 (ECF No. 160).

Because Exhibits 12, 13, and 14 contain sensitive information concerning the Kaplans' home, Adam Kaplan respectfully moves to seal these exhibits.

Because Exhibit 20 contains sensitive medical information, Adam Kaplan respectfully moves to seal this exhibit.

DATED: New York, New York  
May 16, 2025

/s/ Mark S. Cohen  
Mark S. Cohen  
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